

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEWS DIVISION**

PECOS RIVER TALC LLC,

Plaintiff,

-v-

DR. THERESA SWAIN EMORY, DR.  
RICHARD LAWRENCE KRADIN, AND  
DR. JOHN COULTER MADDOX,

Defendants.

Civil Action No. 4:24-cv-00075-JKW-RJK

**PECOS RIVER TALC LLC'S MOTION TO COMPEL  
THE IDENTITIES OF THE ARTICLE'S SUBJECTS  
AND FOR AN AMENDED ANSWER**

Pursuant to Federal Rules of Civil Procedure 8, 15, 26, and 37, Plaintiff Pecos River Talc LLC moves the Court to compel Defendants to provide the identities of the individuals in the Article and to file an amended answer within 14 days admitting or denying whether Pecos River Talc LLC has accurately identified the six individuals discussed in its complaint. The reasons and authority for this Motion are set forth with particularity in the accompanying Memorandum.

Pursuant to Federal Rule of Civil Procedure 37(a)(1) and Local Civil Rule 37(E), the undersigned counsel certifies that counsel for Pecos River Talc LLC conferred in good faith with opposing counsel before filing this motion.

Dated: April 22, 2025

Respectfully submitted,

/s/ Benjamin L. Hatch

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*Counsel for Pecos River Talc LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 22, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send notification of electronic filing to all counsel of record.

/s/ Benjamin L. Hatch

Benjamin L. Hatch (VSB No. 70116)